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LAW FIRM-ABOGADOS

Charlie Ezra Carrillo (NY)

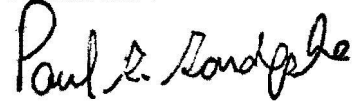
October 19, 2021

VIA ECF

The Honorable Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

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cv'32-22'c0 0

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: October 20, 2021

Re: *Choto Pleitez v. Republic of El Salvador*
21-cv-01424 (PGG)
Motion for Adjournment of Pretrial Conference

Dear Judge Gardephe:

The undersigned counsel writes on behalf of the Plaintiffs to request an adjournment of the Pretrial Conference scheduled for October 21, 2021, at 10:30 AM.

Plaintiffs have requested two previous adjournments of the Pretrial Conference to serve the summonses to the Defendants located in El Salvador. The last motion was approved on June 21, 2021. Plaintiffs also filed an amended complaint on May 12, 2021, which removed one defendant from the complaint. The Clerk of the Court issued the summons on May 28, 2021. Plaintiffs sent the summons to each of the Defendants via FedEx on June 16, 2021. All the summonses were scheduled to be delivered by June 23, 2021. Unfortunately, the Defendants (public institutions) located in the Republic of El Salvador rejected the delivery of the FedEx packages.

As a result of the rejection of the FedEx packages, the undersigned counsel has retained a local law firm to assist in the service process of each of the Defendants located in El Salvador. It is expected that the service process will take approximately two months.

1

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Because several Defendants are in El Salvador, they will not be available for the October 21, 2021, Pretrial Conference. Since Defendants are outside of any judicial district of the United States, they have 90 days to respond to the complaint. (FRCP 12 (a)(1)(A)(ii)).

Plaintiffs' counsel respectfully requests Your Honor grant this motion and order an adjournment of the Pretrial Conference and reschedule it for a later date the Court determines to be appropriate to allow Defendants the opportunity to attend or respond to the complaint.

Respectfully submitted,

Charlie Carrillo

Charlie Carrillo, Esquire

2

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